

U.S. DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

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STEVE MILLER

-vs-

KEVIN M. FLYNN, ET AL  
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# 81-4275-FW

DEPOSITION of KEVIN M. FLYNN, taken on behalf of  
the Plaintiff, pursuant to the Federal Rules of Civil  
Procedure, before Allan Nortonen, a Certified Shorthand  
Reporter and Notary Public in and for the Commonwealth  
of Massachusetts, at the law offices of Geller &  
Weinberg, 100 Boylston Street, Boston, Massachusetts,  
on Wednesday, April 14, 1982, commencing at 10:10 A.M.

Appearances:

Donald C. Randolph, Esq., representing the  
Plaintiff

Joel Levine, Esq., representing the  
Defendants

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1 Q How about a person named Stanley Cath? Do you know who  
2 that is?

3 A Stanley Cath? I've heard that name, too. I've heard that  
4 name.

5 Q How about Doctor John Clark? Did you ever hear that name?

6 A Yes.

7 Q You've heard of the Boston Personal Development Institute?

8 A No. That's the organization to which Mr. Clark -- that's  
9 right, I'm sorry. I saw it on the complaint. I didn't  
10 notice what it was, though.

11 Q Did you have any contact with Doctor Clark with respect to  
12 the Miller case?

13 MR. LEVINE: You want to break that down timewise  
14 or want him to say anytime?

15 Q We'll break it down timewise: prior to the filing of the  
16 complaint did you have any communication or correspondence  
17 with Doctor Clark regarding Steve Miller?

18 A Prior to filing the complaint, yes.

19 (Discussion held off the record)

20 Q Would you please indicate the first time you had  
21 communication or correspondence with Doctor Clark  
22 regarding the Miller case?

23 A Well, I'll be reaching a bit. I would say probably in  
24 February, maybe, of 1981.



1 family came to you very distressed because their son  
2 or daughter had entered the clergy in some otherwise  
3 long-recognized religion?

4 A. Yes.

5 Q. What religion was that, just for background?

6 A. Two or three times, in the Catholic, about  
7 Catholic orders.

8 Q. Were these families themselves Catholic or  
9 were they nonCatholics who had a family member that  
10 went into Catholicism?

11 A. Both. That was easily handled. I simply  
12 called up the hierarchy and said, what's going on.  
13 There's something here that I'm aware of that sounds  
14 a little bit culty.

15 The Catholic Church then talked to the  
16 family and also checked to find out what's going on.  
17 And they will also put pressure on these groups if  
18 they're playing games.

19 They wish to be pro-family. They  
20 don't want to tear families apart. They don't  
21 believe that there is the Catholic family and then  
22 there is everything else. It's an entirely  
23 different structure.

24 Q. When you said these groups, are you



1 Q Did you contact him or did he contact you?

2 A I think I contacted him.

3 Q Did someone ask you to contact him?

4 A I think Bernard Miller.

5 Q What did Bernard Miller ask you to do?

6 A I think he wanted to meet with John Clark.

7 Q Had you talked with Bernard Miller about Doctor Clark  
8 prior to this conversation?

9 A Yes.

10 Q What did you tell Bernard Miller about Doctor Clark?

11 A Well, I said that he was a psychiatrist from Harvard,  
12 I believe from Harvard or graduated from Harvard. And  
13 that he was probably as familiar with the Church of  
14 Scientology and its practices and effect on the mind  
15 as well as anyone we were aware of. That he might be  
16 able to counsel or whatever with the Millers or talk with  
17 the Millers.

18 Q For what purpose?

19 A I don't know. Just to talk to them about, you know, the  
20 grief that they were going through or feeling. Harriet  
21 Miller, as I recall, she was very -- was the one who was  
22 particularly upset.

23 Q Didn't Mr. Miller want to know whether there was someone  
24 that could assist them in dealing with Steve Miller --



1 A No.

2 Q -- other than yourself?

3 A No. This was -- I think this was after the whole  
4 incident, after the discussions with Steve Miller.

5 Q And they asked you to refer them to a psychiatrist for  
6 their own use?

7 A No. I told you I told Bernard Miller about Jack Clark.

8 Q When did you first mention the name of Jack Clark to  
9 Bernard Miller?

10 A Probably in the first meeting we ever had.

11 Q What did you say about him?

12 A I just said what I told you before. He was as much an  
13 expert as I knew in the field of psychiatry concerning  
14 cults and their effect on the mind and the families who  
15 suffer through them, I guess, through the problems of  
16 children or spouses and cults.

17 Q Had you worked with Doctor Clark in the past?

18 A Well, he'd been to our office a number of times. I had  
19 spoken to him three or four times.

20 Q Did you suggest that Doctor Clark may be able to advise  
21 them on how to get Steve out of the Church of Scientology?

22 A No.

23 Q Did Bernard Miller indicate to you he would like the  
24 assistance of Doctor Clark for that purpose?



1 A No.

2 Q At some point in time you contacted Doctor Clark?

3 A Yes.

4 Q Did you call him or did he call you?

5 A I believe I called him.

6 Q What did you say to him?

7 A I just said -- if I recall the conversation correctly, I  
8 said that Bernard Miller, who I -- he may have even known  
9 him prior to me giving the name. I think Bernard Miller  
10 knew of Jack Clark's name. His son was involved in the  
11 Church of Scientology and had -- is still involved in the  
12 Church of Scientology, and that he had spoken with Joe  
13 Flanagan and Pat Osler and his decision, Steve Miller's  
14 decision, was to return to the church. And Harriet  
15 Miller I think in particular was extremely upset and they  
16 didn't know where to turn, didn't know what to do. That  
17 Bernard Miller and his wife wanted to talk to Jack Clark  
18 for themselves.

19 Q Is that the first time you talked with Doctor Clark  
20 regarding the Millers, in that conversation?

21 A I think so.

22 Q What did Doctor Clark say to you?

23 A He just said, "Well, maybe at some time I can give Bernard  
24 Miller a call." or "We can get in touch or meet or